

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

**RAMZEE ROBINSON,**

**Plaintiff,**

**v.**

**KANSAS CITY CHIEFS FOOTBALL  
CLUB, INC.,**

**Defendant.**

)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

**Case No. 4:25-cv-00443-DGK**

**DEFENDANT KANSAS CITY CHIEFS FOOTBALL CLUB’S MOTION TO STAY  
ACTION AND COMPEL ARBITRATION**

Defendant Kansas City Chiefs Football Club, Inc. (the “Club”) moves the Court pursuant to the Federal Arbitration Act, 9 U.S.C. §§ 3-4, for an order staying this action and compelling binding arbitration of Plaintiff Ramzee Robinson’s (“Plaintiff”) claims. As set forth fully in the Suggestions in Support, filed contemporaneously herewith, Plaintiff and the Club have mutually agreed to a binding arbitration agreement as part of Plaintiff’s employment agreement with the Club. The Arbitration Agreement requires the parties arbitrate any and all disputes that arise between them. The Arbitration Agreement is enforceable as it is a valid agreement under Missouri law, and importantly, contains an enforceable delegation provision.

WHEREFORE, the Club respectfully requests that this Court enter an Order enforcing the Arbitration Agreement and compelling binding arbitration of all claims identified in this action.

Respectfully submitted,

POLSINELLI PC

By: /s/ Eric E. Packel

ERIC E. PACKEL (#44632)

EMMA R. SCHUERING (#65169)

ISAAC T. CAVERLY (#72740)

900 W. 48th Place, Suite 900

Kansas City, MO 64112-1895

(816) 753-1000

Fax No. (816) 753-1536

[epackel@polsinelli.com](mailto:epackel@polsinelli.com)

[eschuering@polsinelli.com](mailto:eschuering@polsinelli.com)

[icaverly@polsinelli.com](mailto:icaverly@polsinelli.com)

ATTORNEYS FOR DEFENDANT

ATTORNEYS FOR DEFENDANT

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing pleading was served (  X  ) electronically via the Court's notification system; (      ) by United States Mail, postage prepaid; and/or (      ) by E-mail this 15th day of July, 2025, to:

Katrina Y. Robertson, Esq.  
Katrina Y. Robertson, LLC  
The Cable Building  
1321 Burlington Street, Suite 600  
North Kansas City, MO 64116  
816-885-4974  
Fax: 816-817-4964  
[krobertson@kyrobertsonlaw.com](mailto:krobertson@kyrobertsonlaw.com)

Eric K. Bank, MBN, Esq.  
Banks Law LLC  
The Keunstler Verein Building  
1824 Choteau Avenue  
St. Louis, MO 63103  
314-583-7075  
Fax: 314-216-3849  
[ericbanks@banksllc.com](mailto:ericbanks@banksllc.com)

Connie D. Breeden, Esq.  
Connie D. Breeden Law Office  
2007 Lincoln Street  
Columbia, SC 29201  
803-255-1010  
[breedenlaw@att.net](mailto:breedenlaw@att.net)

ATTORNEYS FOR PLAINTIFF

/s/ Eric E. Packel